

BEFORE THE
POSTAL RATE COMMISSION

POSTAL RATE AND FEE CHANGES, 1997

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**SIXTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD
(UPS/USPS-T16-26)**

(September 15, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Hatfield (UPS/USPS-T16-26).

Respectfully submitted,



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**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD**

UPS/USPS-T16-26. Please refer to Figure II-4, on page 11 of your direct testimony.

- (a) How are GCD and zone determined for a DBMC parcel? Please explain your answer.
- (b) Is a DBMC mailer permitted to designate the 3-digit ZIP Code of any of the P&DCs in the DBMC service area as the point of origin for purposes of deriving the zone applicable to the DBMC shipment? Please explain your answer.
- (c) What percentage of DBMC volume has a P&DC designated as the point of origin?
- (d) What percentage of DBMC volume has a P&DC designated as the point of origin where the 3-digit ZIP code of the designated P&DC is different from the 3-digit ZIP code area that would be assigned as the point of origin for the DBMC piece in the absence of mailer designation?
- (e) Please explain how your analysis of the relationship between intermediate transportation costs and GCD for DBMC mail accounts for the ability of a mailer to designate any P&DC as the point of origin.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



Stephanie Richman

Dated: September 15, 1997
Philadelphia, PA